

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2016 DEC 27 P 2:37

UNITED STATES OF AMERICA

DEPUTY CLERK

v.

No. 3:15-CR-044-D

RICHARD C. ANDREWS (25)

SUPERSEDING INFORMATION

The United States charges:

Count One

Conspiracy to Distribute Controlled Substances
(Violation of 21 U.S.C. § 846)

Beginning in January 2013 and continuing through July 2014, the exact dates being unknown, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Richard C. Andrews** knowingly and intentionally combined, conspired, confederated and agreed with persons known and unknown to possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

All in violation of 21 U.S.C. § 846, the penalty for which is in 21 U.S.C. § 841(a)(1) and (b)(1)(C).

Count Two
Conspiracy to Launder Monetary Instruments
(Violation of 18 U.S.C. § 1956(h))

On or about February 20, 2013, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Richard Andrews**, did knowingly combine, conspire, confederate, and agree with Muhammad Faridi, and others both known and unknown to the Grand Jury, to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, that is, depositing \$25,000.00 in the form of a check payable to him into Wells Fargo account ending in 1587 held in the name of Richard Andrews, DO, PA, involving the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute a controlled substance, namely oxycodone, a Schedule II controlled substance, in violation of 21 U.S.C. § 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the transaction represented the proceeds of some form of unlawful activity.

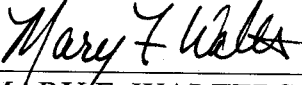
All in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h).

Forfeiture Notice
(21 U.S.C. § 853(a) and 18 U.S.C. § 982(a)(1))

Upon conviction for the offense alleged in Count One of the Superseding Information, and pursuant to 21 U.S.C. § 853(a), the defendant, **Richard Andrews**, shall forfeit to the United States any property constituting or derived from proceeds obtained, directly or indirectly, as a result of the offense and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense.

Upon conviction for the offenses alleged in Count Two of the Superseding Information, and pursuant to 18 U.S.C. § 982(a)(1), the defendant, **Richard Andrews**, shall forfeit to the United States of America any property involved in, or traceable to property involved in the offense.

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